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**NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP**  
**Leed Environmental, Inc.**  
**124 Deborah Drive**  
**Reading, PA 19610**  
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August 6, 2003

**First Class Mail**

Mr. Brad Bradley  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

**RE: NL Industries/Taracorp Superfund Site; Granite City, Illinois**  
**Consent Decree**  
**Progress Report 51 (July 2003)**

Dear Mr. Bradley:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the "site"), two copies of this letter are submitted on behalf of the NL Industries/Taracorp Superfund Site Group ("Group") to provide the U.S. Environmental Protection Agency ("EPA") with a progress report for activities related to the remediation of the residential lots and remote fill areas, the remediation of the Taracorp pile, the remedial action for groundwater, and operation and maintenance activities that were performed during July 2003.

1. **Actions Taken During Previous Month to Comply with the Consent Decree:**

- On July 1, 2003, the Group's project coordinator issued a progress report to EPA.
- On July 21, 2003, the Group's project coordinator provided to EPA copies of spreadsheets prepared by ENTACT, Inc. ("ENTACT") which summarized the results of soil sampling performed by ENTACT as part of the five-year review.
- On July 22, 2003, the Group's project coordinator spoke with EPA's project manager and discussed the results of the most recent groundwater monitoring event performed by ARCADIS at the site in March 2003. In addition, the results of soil testing performed by ENTACT as part of the five-year review were discussed.



- During July 2003, ARCADIS continued efforts to prepare a report to summarize the data from laboratory testing of groundwater samples collected at the site during the week of March 24, 2003.
- During July 2003, ENTACT initiated efforts to prepare a report to summarize the results of soil sampling performed in conjunction with EPA's five-year review.

2. **Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Month:**

- Not applicable for this reporting period.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- As previously reported, the Group's project coordinator issued a copy of ENTACT's March 28, 2003 operation and maintenance inspection report to EPA on April 23, 2003. The Group will advise EPA regarding its plans for performing maintenance activities at the site to address the items in ENTACT's report.
- ARCADIS will continue to prepare a report to summarize the data collected during groundwater monitoring activities at the site in March 2003. At the present time, the Group anticipates that the groundwater monitoring report will be submitted to EPA in August 2003.
- As noted above, the Group issued to EPA spreadsheets which summarized the results of soil sampling performed by ENTACT in conjunction with EPA's five-year review at the site. ENTACT will continue efforts to prepare a report to summarize the results.
- In April 2003, Group representatives issued letters to EPA to: (1) request EPA's written certification pursuant to Section 48(b) of the Consent Decree to confirm that the Group has completed remedial action at the site; (2) request clarifications regarding the Supplemental Environmental Project; (3) request EPA's approval for the Madison County Community Development Agency to submit the draft work plan for the Supplemental Environmental Project to EPA by July 19, 2003; (4) request EPA's approval to reduce the amount of

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financial security for the site; (5) request EPA's written confirmation that Johnson Controls' 2002 Annual Report is sufficient to demonstrate the Group's financial ability to complete the remaining work at the site; and to (6) request EPA's written confirmation that it is not necessary for the Group to maintain comprehensive general liability insurance and automobile liability insurance pursuant to the Consent Decree because remedial activities have been completed at the site. The Group will address EPA's responses, as required, upon receipt.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- Not applicable for this reporting period.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- Not applicable for this reporting period.

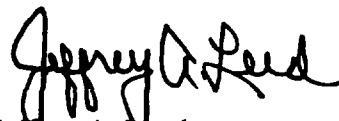
7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

- Not applicable for this reporting period.

Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.



Jeffrey A. Leed  
Project Coordinator

cc: Ms. Sandra Bron - Illinois EPA (by first class mail)  
Mr. Jack Kratzmeyer - ARCADIS (by first class mail)  
Mr. Rich Wood - ENTACT, Inc. (by first class mail)  
Technical Committee, NL Industries/Taracorp Superfund Site Group  
(by first class mail)